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## VIA TELECOPIER 410-358-1311 AND U.S. MAIL

September 17, 2008

Colleen Lates
Administrative Officer
Center for Hospital Services
4160 Patterson Ave.
Baltimore, MD 21215

Dear Ms. Lates:

This letter is being submitted in response to the solicitation of the Maryland Health Care Commission ("Commission") of comments regarding the petition filed by Calvert Memorial Hospital ("Calvert") requesting that the State Health Plan for Acute Inpatient Rehabilitation Services ("Plan") be amended to eliminate the docketing and approval rules that require rehabilitation hospitals and units in a regional service area to maintain a certain occupancy rate.

We have considered Calvert's petition and assuming all of the facts presented in the petition are correct, we join with Calvert in urging an amendment to the Plan permitting the docketing and review of Calvert's Certificate of Need application to provide these services only in Southern Maryland. We do not support any amendment or change to the Plan that would waive or eliminate the docketing or approval rules in any other region but Southern Maryland. The Plan's rules clearly support the regionalization of inpatient rehabilitation services in specialty hospitals and units, including the services provided by Adventist Rehabilitation Hospital at its Rockville and Takoma Park locations.

We would urge the Commission to limit Calvert's proposed change to the Plan to the Southern Maryland region only. Should you have any questions concerning these comments, please contact me.

Sincerely.

Paula S. Widerlite

Vice President System Strategy

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Christopher Hall

Ken DeStefano, Esq.

Doris Reinhart

William G. "Bill" Robertson

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